# IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

IN RE:	§	
	§	
NIA NATIONAL INSURANCE AGENC	Y §	CASE NO. 11-41529
	§	(Chapter 11)
DEBTOR	§.	

### MARIJANE TROPOLOC'S RESPONSE TO OBJECTION TO CLAIM NO. 19

# TO THE HONORABLE CHIEF JUDGE BRENDA T. RHOADES, UNITED STATES BANKRUPTCY JUDGE:

Marijane Tropoloc ("Tropoloc"), a creditor and party in interest in the bankruptcy case of Larry McClendon, responds to the objections to Tropoloc's claim No. 19, and would show the Court the following:

- 1. Tropoloc admits the allegations contained in paragraph 1 of the objections.
- 2. Tropoloc admits the allegations contained in paragraph 2 of the objections.
- 3. Tropoloc admits the allegations contained in paragraph 3 of the objections.
- 4. Concerning paragraph 4, Tropoloc admits that McClendon objects to the claim, but asserts that the claim is valid.
  - 5. Tropoloc denies the allegations contained in paragraph 5 of the objections.
  - 6. Tropoloc denies the allegations contained in paragraph 6 of the objections.
- 7. Concerning paragraph 7, Tropoloc admits that McClendon's affidavit is attached, but denies the truthfulness of the affidavit and asserts that the claim is valid.

WHEREFORE, Tropoloc requests that the objections to the claim be denied, that the proofs of claim filed by Tropoloc be allowed, and for such other and further relief as may be appropriate.

Respectfully Submitted,

#### **SANFORDBETHUNE**

By: /s/ Brian P. Sanford
BRIAN P. SANFORD
Texas Bar No. 17630700

3610 SHIRE BLVD., STE. 206 RICHARDSON, TX 75082 PH: (972) 422-9777 FAX: (972) 422-9733

ATTORNEYS FOR MARIJANE TROPOLOC

## **CERTIFICATE OF SERVICE**

It is hereby certified that service of the foregoing Marijane Tropoloc's Response to Objection to Claim No. 19 has been made on the 20th day of April, 2012, via the Court's ECF system which sends an electronic copy thereof to:

Joyce W. Lindauer, Attorney for Debtor 8140 Walnut Hill Lane, Suite 301 Dallas, Texas 75231

/s/ Brian P. Sanford